

ORIGINAL

00-258

Commissioner Furchgott-Roth
Commissioner Ness
Commissioner Powell
Commissioner Tristani
Federal Communications Commission
445 12th St., SW
Washington, DC 20554

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FEDERAL COMMUNICATIONS COMMISSION
OFFICE OF THE SECRETARY
HAROLD FURCHGOTT-ROTH

Re: FCC 00-455, ET Docket No. 00-258/RM-9920 and 9911

January 22, 2001

EX PARTE OR LATE FILED

Dear Commissioners:

I am concerned about the future of the ITFS spectrum, which is under assault in the Commission's Notice of Proposed Rule Making on 3G spectrum allocations that was released January 5, 2001. ITFS is an important part of our educational program at the schools in Lee County School District. Moreover, preservation of the full ITFS band is absolutely critical if wireless broadband is to become a reality not only for our students but also for our entire community.

As you are aware, recent rule changes have opened the ITFS spectrum to the implementation of wireless two-way video and broadband data services, including high speed Internet access. The educational power of ITFS has been expanded under the digital two-way rules to provide advanced learning services, interactive video, and wireless broadband Internet. As distance learning becomes more robust and interactive, ITFS offers educational institutions throughout the country an affordable high-speed on-ramp to the broadband Internet for students and adult learners in the classroom, at home and at work. This goal was recently cited as the first priority for policymakers by the bipartisan Congressional Web-Based Education Commission. In addition, fixed wireless broadband promises to bring a competitor to DSL and cable modem technologies to our community, making broadband access not only more widely available but also more affordable.

ITFS does not only benefit schools, students and adult learners, however. In addition to the broad range of community programming currently carried on ITFS spectrum, the recent two-way order has filled a void where legislation and regulation have failed to produce affordable, ubiquitous broadband Internet access for Americans. Working in conjunction with wireless communications companies, ITFS spectrum is being used to bring broadband to underserved populations in rural, urban and otherwise isolated communities nationwide. ITFS licensees are therefore serving the educational community as they help the nation and the Commission to bridge the Digital Divide.

If the Commission reallocates any part of the ITFS spectrum for 3G mobile device services, the capacity, usefulness, and value of ITFS would be significantly diminished. Even if only part of the spectrum is taken away, many educational institutions would lose their ITFS service altogether, while others would face new equipment costs, service disruption and

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cutbacks, lower quality of service and signal interference. In either scenario, the ITFS community would be incapable of supporting advanced wireless services and promoting the development of broadband services to the educational community and to underserved communities nationwide.

If the ITFS spectrum is compromised in any way, these public benefits will be lost. We at the School District of Lee County hope that you will support us in maintaining the integrity of our spectrum and in keeping this tremendous educational resource alive and strong.

Sincerely,

Carol Greenfield

00-258
ORIGINAL

CLAY COUNTY DISTRICT SCHOOLS



900 Walnut Street
Green Cove Springs, Florida 32043

Telephones:
904/284-6500 (GCS) 904/272-8100 (OP)
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Commissioner Furchgott-Roth
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FEDERAL COMMUNICATIONS COMMISSION
OFFICE OF THE SECRETARY

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Re: FCC 00-455, ET Docket No. 00-258, RM-9920 and 9911

EX PARTE OR LATE FILED

January 29, 2001

Dear Commissioners:

I am concerned about the future of the ITFS spectrum, which is under assault in the Commission's Notice of Proposed Rule Making on 3G spectrum allocations that was released January 5, 2001. ITFS is an important part of our educational program at *Clay High School*. Moreover, preservation of the full ITFS band is absolutely critical if wireless broadband is to become a reality not only for our students but also for our entire community.

As you are aware, recent rule changes have opened the ITFS spectrum to the implementation of wireless two-way video and broadband data services, including high speed Internet access. The educational power of ITFS has been expanded under the digital two-way rules to provide advanced learning services, interactive video, and wireless broadband Internet. As distance learning becomes more robust and interactive, ITFS offers educational institutions throughout the country an affordable high-speed on-ramp to the broadband Internet for students and adult learners in the classroom, at home and at work. This goal was recently cited as the first priority for policymakers by the bipartisan Congressional Web-Based Education Commission. In addition, fixed wireless broadband promises to bring a competitor to DSL and cable modem technologies to our community, making broadband access not only more widely available but also more affordable.

ITFS does not only benefit schools, students and adult learners, however. In addition to the broad range of community programming currently carried on ITFS spectrum, the recent two-way order has filled a void where legislation and regulation have failed to produce affordable, ubiquitous broadband Internet access for Americans. Working in conjunction with wireless communications companies, ITFS spectrum is being used to bring broadband to underserved populations in rural, urban and otherwise isolated communities nationwide. ITFS licensees are therefore serving the educational community as they help the nation and the Commission to bridge the Digital Divide.

If the Commission reallocates any part of the ITFS spectrum for 3G mobile device services, the capacity, usefulness, and value of ITFS would be significantly diminished. Even if only part of the spectrum is taken away, many educational institutions would lose their ITFS service altogether, while others would face new equipment costs, service disruption and cutbacks, lower quality of service and signal interference. In either scenario, the ITFS

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community would be incapable of supporting advanced wireless services and promoting the development of broadband services to the educational community and to underserved communities nationwide.

If the ITFS spectrum is compromised in any way, these public benefits will be lost. We at the *Clay High School* hope that you will support us in maintaining the integrity of our spectrum and in keeping this tremendous educational resource alive and strong.

Sincerely,

A handwritten signature in black ink that reads "Alisa Jones". The signature is written in a cursive style with a large, looped initial "A".

Alisa Jones
Supervisor of Instructional Support Services

Cc: Walter Brock, Assistant Superintendent for Instruction

February 19, 2001

Chairman Michael Powell
Commissioner Harold Furchgott-Roth
Commissioner Susan Ness
Commissioner Gloria Tristani
Federal Communications Commission
445 12th Street, SW
Washington, DC 20554

Re: FCC ET Docket 00-258

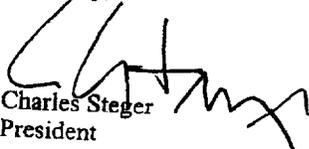
Dear Chairman and Commissioners:

We at Virginia Tech are very concerned with the Commission's Notice of Proposed Rulemaking on 3G that was released January 5, 2001. We are disturbed to learn that ITFS spectrum is in jeopardy of being reallocated in part or in whole in favor of 3G wireless.

The FCC only recently enacted rule changes to expand the educational power of ITFS and enable the spectrum to be used for two-way broadband connectivity that could support high speed Internet access, videoconferencing, and other interactive applications. The educational community is moving quickly to make use of the new capabilities to provide needed connectivity to a broader and more diverse group of students. This is especially important for state and land grant universities, such as Virginia Tech. We recognize that broadband connectivity is critical for distance and online learning, and it is needed to reach the many non-traditional types of students that we serve in our rural region.

If the Commission reallocates any part of the ITFS spectrum for 3G mobile device services, the capacity, usefulness and value of ITFS would be significantly diminished. Therefore, Virginia Tech believes the ITFS spectrum should be retained in its entirety for educational use. We ask that you preserve the ITFS spectrum as is, and protect this vital educational resource.

Sincerely,


Charles Steger
President

Cc: Mr. Ralph Byers, Director of Governmental Relations, Virginia Polytechnic Institute and State University
Mr. Earving L. Blythe, Vice President, Information Systems, Virginia Polytechnic Institute and State University
Ms. Jeri Semer, Executive Director, ACUTA
Dr. Peter Gossman, Chairman, National ITFS Association

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OFFICE OF THE SECRETARY

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February 9, 2001

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James

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2001 FEB 21 A 10: 28

FEDERAL COMMUNICATIONS COMMISSION
OFFICE OF THE SECRETARY

OFFICE OF COMMUNICATIONS
HAROLD FURCHTGOTT

EX PARTE OR LATE FILED

Commissioner Furchgott-Roth
Commissioner Ness
Commissioner Powell
Commissioner Tristani
Federal Communications Commission
445 12th St., SW
Washington, D.C. 20554

Re: FCC 00-455, ET Docket No. 00-258/ RM-9920 and 9911

Dear Commissioners:

I am concerned about the future of the ITFS spectrum, which is under assault in the Commission's Notice of Proposed Rule Making on 3G spectrum allocations that was released January 5, 2001. ITFS is an important part of our educational program at Portland Community College. We have been broadcasting educational programming on our B-group channels since 1986, and this technology is an important part of our educational delivery system. Moreover, preservation of the full ITFS band is absolutely critical if wireless broadband is to become a reality not only for our students but also for our entire community.

As you are aware, recent rule changes have opened the ITFS spectrum to the implementation of wireless two-way video and broadband data services, including high speed Internet access. The educational power of ITFS has been expanded under the digital two-way rules to provide advanced learning services, interactive video, and wireless broadband Internet. As distance learning becomes more robust and interactive, ITFS offers educational institutions throughout the country an affordable high-speed on-ramp to the broadband Internet for students and adult learners in the classroom, at home and at work. This goal was recently cited as the first priority for policymakers by the bipartisan Congressional Web-Based Education Commission. In addition, fixed wireless broadband promises to bring a competitor to DSL and cable modem technologies to our community, making broadband access not only more widely available but also more affordable.

ITFS does not only benefit schools, students and adult learners, however. In addition to the broad range of community programming currently carried on ITFS spectrum, the recent two-way order has filled a void where legislation and regulation have failed to produce affordable, ubiquitous broadband Internet access for Americans. Working in conjunction with wireless communications companies, ITFS spectrum is being used to bring broadband to underserved populations in rural, urban and otherwise isolated communities nationwide. ITFS licensees are therefore serving the educational community as they help the nation and the Commission to bridge the Digital Divide.

P.O. Box 19000
Portland, Oregon
97280-0990
503/244-6111

College Board:

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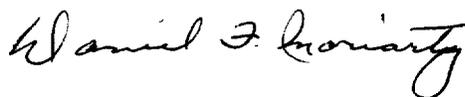
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If the Commission reallocates any part of the ITFS spectrum for 3G mobile device services, the capacity, usefulness, and value of ITFS would be significantly diminished. Even if only part of the spectrum is taken away, many educational institutions would lose their ITFS service altogether, while others would face new equipment costs, service disruption and cutbacks, lower quality of service and signal interference. In either scenario, the ITFS community would be incapable of supporting advanced wireless services and promoting the development of broadband services to the educational community and to underserved communities nationwide.

If the ITFS spectrum is compromised in any way, these public benefits will be lost. We at the Portland Community College hope that you will support us in maintaining the integrity of our spectrum and in keeping this tremendous educational resource alive and strong.

Sincerely,

A handwritten signature in black ink that reads "Daniel F. Moriarty". The signature is written in a cursive style with a large, prominent 'M'.

Daniel F. Moriarty
President
Portland Community College



February 19, 2001

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2001 FEB 22 P 1:50

Commissioner Harold Furchtgott-Roth
Federal Communications Commission
445 12th Street, SW
Washington, DC 20554

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HAROLD FURCHTGOTT-ROTH
MAR - 9 2001

ORIGINAL

EX PARTE OR LATE FILED COMMUNICATIONS COMMISSION
OFFICE OF THE SECRETARY

Dear Mr. Furchtgott-Roth:

**GUILFORD TECHNICAL
COMMUNITY COLLEGE**

JAMESTOWN CAMPUS
601 HIGH POINT RD.
POST OFFICE BOX 309
JAMESTOWN, NC 27282
TEL: 336.334.4822
TEL: 336.454.1126

WASHINGTON STREET CAMPUS

501 WEST WASHINGTON ST.
GREENSBORO, NC 27401
TEL: 336.334.4822 ext: 4220

J.C. PRICE CAMPUS

400 WEST WHITTINGTON ST.
GREENSBORO, NC 27406
TEL: 336.334.4822 ext: 4324

HIGH POINT CAMPUS

901 SOUTH MAIN ST.
HIGH POINT, NC 27260
TEL: 336.454.1126 ext: 4110

AVIATION CENTER

260 NORTH REGIONAL RD.
GREENSBORO, NC 27409
TEL: 336.665.9425

SMALL BUSINESS CENTER

2007 YANCEYVILLE ST., SUITE 220
GREENSBORO, NC 27405
TEL: 336.334.5211

<http://technet.gtcc.cc.nc.us>

For the past several years, we have worked diligently here at Guilford Technical Community College and within the North Carolina Community College System to harness the power of technology to the benefit of our students. Two of the most challenging and yet most rewarding endeavors have been the development of online learning and the use of instructional technology within the traditional classroom. We have acquired instructional technology to the extent our resources allow and have trained faculty in the use of that technology.

With nearly 1,200 students enrolled in online courses and nearly a quarter of our full-time faculty excited about using technology and the power of the Internet to teach, we continue to be amazed at the excitement and joy that technology can bring to the learning experience. One of our current initiatives is to make it possible for students to complete full-degree programs via the web by September 2001. We feel that we have been creative and responsible in assisting our faculty in the incorporation of technology. We look forward to enhanced broadband access to the Internet and to the new enhancements this kind of access can bring to teaching and learning.

Let me share two small, but typical examples of how our faculty is using technology. We have one faculty member in the Medical Office Assisting program who is excited about videotaping many of the procedures she teaches so that students can literally see them whenever and wherever they need. She envisions being able to make these routines and procedures available to them over the Internet on demand and needs the broadband capacity to make this possible.

We have another faculty member who is developing an online architectural history class and wants her students to watch certain videos about that history. With the technology and bandwidth now available to her, she will have to continue to have her students come on campus to see these videos. Wouldn't it be a powerful service, if those students could watch it from their workplaces and homes when it was truly convenient to them?

These are only two brief examples of why we need to retain the spectrum allocated to schools, colleges and universities for ITFS by the FCC. Please do not let the spectrum disappear just at the time when we in education are most

prepared to use and have the greatest need for the next generation of learning technology. Though the examples given here are about our one college, there is an incredible and exciting future ahead within this North Carolina Community College System. We have a shared vision of providing lifelong learning using wireless technology. Please do not take our vision from us.

We understand that the need of the third generation of users of mobile/handheld devices is an alluring call. Surely there is room, though, for those of us in education to have the space and spectrum we need to take education to its next level – a level where people clamor for their chance to learn new things, enhance their skills, and compete for jobs.

Sincerely,

A handwritten signature in cursive script that reads "Donald W. Cameron".

Donald W. Cameron
President

cc: Bryant Tramont, Legal Counsel
Office of Commissioners Harold Fruchtgott-Roth



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NORTH CAROLINA COMMUNITY COLLEGE SYSTEM
H. Martin Lancaster, President

February 16, 2001

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FEDERAL COMMUNICATIONS COMMISSION
OFFICE OF THE SECRETARY

Commissioner Harold Furchtgott-Roth
Federal Communications Commission
445 12th Street, SW
Washington, DC 20554

EX PARTE OR LATE FILED

Dear Commissioner Furchtgott-Roth:

I write in opposition to the proposal to reallocate the ITFS frequencies to commercial entities for the use of 3G devices. The January 19, 2001 edition of *The Chronicle of Higher Education* featured an article with the headline "Cell-Phone Technology Threatens to Devour Distance-Education Bandwidth." It began with a question that I paraphrase only slightly to bring it into the digital age: **Will educational information technologies be sacrificed on the altar of the next-generation cell phone?**

It has been suggested that the ITFS users could be relocated to other frequencies. There are three problems with that scenario. First, they would likely be inferior frequencies higher in the spectrum that would require more power to cover a given distance. Second, such a relocation would make worthless much of the work done by the N.C. Community College System and our private sector partner, Wireless One of North Carolina (WONC). Third, it would quite likely result in that partnership coming apart.

It is that third issues on which I would like to elaborate. WONC is owned on a 50% - 50% basis by WorldCom and CT Communications (CT), the later being a North Carolina company that has proven it can deliver quality telecommunication services to rural areas and still make a profit. All our dealings have been with CT, indicating that WorldCom has delegated negotiations to CT. We believe that the self-interests of CT coincide in most cases with the interests of the Community College System and the State of North Carolina. Further, from past dealings we know that the people at CT are people of integrity. They tell us that their business plan will simply not work if any part of the ITFS spectrum is taken away from us.

Having served four terms in the North Carolina House of Representatives, four terms in the U.S. Congress, and several years as Assistant Secretary of the Army, I am keenly aware that compromise always seems the fairest, the most civilized, and the most intuitive thing to do. However, in this case there is apparently no middle ground or room for compromise. We believe WONC when they tell us that the ITFS spectrum must remain

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Commissioner Harold Furchtgott-Roth

Page 2

February 16, 2001

intact for them to continue in this project. A member of my staff reports that this was a common theme at a meeting of the National ITFS Association held in Orlando in January.

I understand the rationale that forms the basis for considering reallocating the ITFS frequencies. For more than two decades they have been grossly under-utilized in the United States. There is a very simple explanation for this fact: Educational institutions and systems are almost always under-funded for new initiatives and services needed for unforeseen circumstances. The lease-back arrangement instituted by the Congress and the FCC has finally made it possible for the three educational systems in North Carolina to work toward a statewide wireless network. The N.C. Public School System, the N.C. Community College System, and the University of North Carolina System intend to utilize the network for cooperative courses and programs, providing for the citizens of the state a seamless web of educational opportunities for lifelong learning.

There are two North Carolinas! One is a prosperous and progressive urban and suburban North Carolina. The other is a struggling rural North Carolina rocked by natural disasters and an uncertain agricultural economy. The digital divide can be seen in stark relief in our state. Wireless technology is the fastest way to narrow and ultimately close the digital divide. A statewide wireless network would allow the three educational systems to provide economic development and workforce training, not just to rural areas, but also to the inner cities that are often impacted by the same forces and that need the same kind of assistance.

It would literally be a shame to deal a death blow to ITFS at a time when we are so close to utilizing the spectrum for the purpose intended by the Congress when it dedicated ITFS for educational purposes. Taking ITFS away from the educational community will not only deprive it of a needed resource, but will also have a demoralizing effect across the nation.

I respectfully ask that you preserve the ITFS spectrum for the purpose that was originally intended by the Congress and allocate other parts of the spectrum to 3-G.

With kindest regards, I am

Sincerely,



H. Martin Lancaster

HML:JPT:sh

c: Bryan Tramont, Legal Counsel
Office of Commissioner Harold Furchtgott-Roth

00-2581

VANCE-GRANVILLE COMMUNITY COLLEGE

ROBERT A. MILLER
PRESIDENT

P.O. BOX 917
HENDERSON, NC 27536



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February 19 2001

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OFFICE OF COMMISSIONER
HAROLD FURCHTOTT-ROTH

FEDERAL COMMUNICATIONS COMMISSION
OFFICE OF THE SECRETARY

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Creedmoor, NC 27522
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Fax: (919) 528-1201

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Louisburg, NC 27549
(919) 496-1567
Fax: (919) 496-6604

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P.O. Box 207
Warrenton, NC 27589
(252) 257-1900
Fax: (252) 257-3612

INTERNET
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E-MAIL
info@vgcc.cc.nc.us

Harold Furchtgott-Roth, Commissioner
Federal Communications Commission
445 12th Street, SW
Washington, DC 20554

RE: ITFS License Needs

Dear Mr. Furchtgott-Roth:

This letter is to inform you of Vance-Granville Community College's long-range plans concerning our ITFS license usage. Currently, we are realizing the potential for broadband Internet connectivity, which is important to Vance-Granville as we have three (3) satellite campuses.

Vance-Granville Community College pays in excess of \$3,000 per month for copper lines to connect our three satellite campuses with voice and data services, which is not cost effective. With technological advances and the use of the ITFS channels our campuses will realize greater data bandwidth and increased integration between technology and the learning process with lower associated costs.

These licenses will be the catalyst for taking distance learning to the next level and the development of an integrated college network that will provide unlimited opportunities. Attached is the college's projected ITFS channel usage plans.

The emergence of "3G" devices will render our licenses useless and will stymie progress towards Vance-Granville's long-range plan of establishing a viable educational network. The ITFS licenses are the future for supplying our students with the best educational resources possible and offer the ability to reach more working families with distance education.

Thank you for your support and consideration.

Sincerely,

Robert A. Miller

/pg

Enclosure

pc: Bryan Tramont, Legal Counsel

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Vance-Granville Community College

Projected ITFS Channel Usage					
Category of IP service	Peak Usage	Hours for Peak Usage	Agegrate Usage	Applications Supported	Number of Courses utilizing services; Total number of sections offered 800
Electronic Mail/ Messaging	64 Kb/s	7:30 am - 10:30 pm	64 Kb/s	Inter Campus Mail, Internet Mail	100%
Web Content	1 - 10 Mb/s	24 Hours	5 Mb/s	Student Portal/ Self service applications	60%
File Transfer	1 - 45 Mb/s	7:30 am -10:30 pm	200 Kb/s	Course down load, Backup services	10%
Video/ Audio content	1 Mb/s	7:30 am -10:30 pm	1 Mb/s	Curriculum courses	10%
Video Conferencing	1 - 10 Mb/s	7:30 am -10:30 pm	1 Mb/s	Curriculum courses; Counseling	10%
Inter Campus Connectivity	20 Mb/s	24 Hours	10 Mb/s	LAN to LAN	100%
Inter Campus Voice Over IP	1.5 Mb/s	7:30 am - 8:30 pm	512 Kb/s	Telephony	25%

VGCC ITFS plans to utilize the allocated frequencies to connect all three remote locations via point to point microwave links.

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STATE BOARD FOR
COMMUNITY AND JUNIOR COLLEGES

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FEDERAL COMMUNICATIONS COMMISSION
HAROLD FURCHTGOTT-ROTT

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FEDERAL COMMUNICATIONS COMMISSION
OFFICE OF THE SECRETARY
EX PARTE OR LATE FILED

February 12, 2001

Commissioner Harold W. Furchtgott-Rott
Federal Communications Commission
445 12th Street, SW
Washington, DC 20554

Re: FCC 00-455, ET Docket NO. 00-258 RM-9920 and 9911

Dear Commissioner Furchtgott-Rott:

I am writing to express my concern about the future of the Instructional Television Fixed Services (ITFS) spectrum, which is under assault in the Commission's Notice of Proposed Rule Making on 3G spectrum allocations that was released January 5, 2001. ITFS is an important part of our educational program at the Mississippi EDNET Institute. Moreover, preservation of the full ITFS band is absolutely critical if wireless broadband is to become a reality for our students and for the entire Mississippi community.

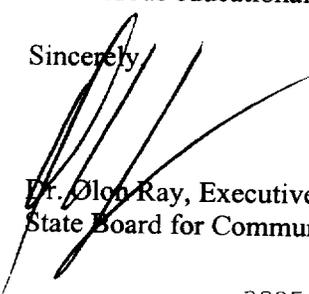
We have great expectations for our use of EDNET in Mississippi. As distance learning becomes more interactive, ITFS offers educational institutions throughout the country an affordable high-speed on-ramp to the broadband Internet for students and adult learners in the classroom, at home and at work.

ITFS does not only benefit schools, students and adult learners, however. Working in conjunction with wireless communications companies, ITFS spectrum is being used to bring broadband to underserved populations in rural, urban, and otherwise isolated communities nationwide. ITFS licensees are therefore serving the educational community as they help the nation and the Commission to bridge the Digital Divide.

If the Commission reallocates any part of the ITFS spectrum for 3G mobile device services, the capacity, usefulness, and value of ITFS would be significantly diminished. Even if only part of the spectrum is taken away, many educational institutions would lose their ITFS service altogether, while others would face new equipment costs, service disruption and cutbacks, lower quality of service and signal interference.

If the ITFS spectrum is compromised in any way, these public benefits will be lost. The Mississippi EDNET Institute request that you will support us in maintaining the integrity of our spectrum and in keeping this tremendous educational resource alive and strong.

Sincerely


Dr. Dion Ray, Executive Director
State Board for Community and Junior Colleges

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00-258



JACKSON STATE UNIVERSITY
JACKSON, MISSISSIPPI 39217

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OFFICE OF
THE PRESIDENT

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February 15, 2001

OFFICE OF COMMISSIONER
HAROLD FURCHTGOTT

(601) 979-2323
Fax No. (601) 979-2948
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FEDERAL COMMUNICATIONS COMMISSION
OFFICE OF THE SECRETARY

Mr. Harold W. Furchtgott-Roth
Federal Communications Commission
445 12th Street, SW
Washington, D.C. 20554

EX PARTE OR LATE FILED

Dear Commissioner Furchtgott-Roth:

I am concerned about the future of the ITS spectrum, which is under assault in the Commission's Notice of Proposed Rule Making on 3G spectrum allocations that was released January 5, 2001. The Mississippi EDNET Institute and its ITS spectrum play an important part in Jackson State University's effort to serve the citizens of Mississippi. Moreover, preservation of the full ITS band is absolutely critical if wireless broadband is to become a reality not only in urban areas but also in many rural areas throughout the state of Mississippi.

As you are aware, recent rule changes have opened the ITS spectrum to the implementation of wireless two-way video and broadband data services, including high speed Internet access. The educational power of ITS has been expanded under the digital two-way rules to provide advanced learning services, interactive video, and wireless broadband Internet. As distance learning becomes more robust and interactive, ITS offers educational institutions throughout the country an affordable high-speed on-ramp to the broadband Internet for students and adult learners in the classroom, at home, and at work. This goal was recently cited as the first priority for policymakers by the bipartisan Congressional Web-Based Education Commission. In addition, fixed wireless broadband promises to bring a competitor to D.L. and cable modem technologies to our community, making broadband access not only more widely available but also more affordable.

ITS does not only benefit schools, students, and adult learners. In addition to the broad range of community programming currently carried on ITS spectrum, the recent two-way order has filled a void where legislation and regulation have failed to produce affordable, ubiquitous broadband Internet access for Americans. Working in conjunction with wireless communications companies, ITS spectrum is being used to bring broadband to undeserved populations in rural urban, and otherwise isolated communities nationwide. Mississippi's ITS licenses have more complete coverage than any state in the country, while Mississippi has the greatest distance to travel to bridge the digital divide. As stated in the Governor's report "Creating Economic Prosperity for a New Century," Mississippi intends to fully utilize these ITS licenses to provide available, affordable Internet access in rural areas to both small business and to homes. ITS licensees are therefore serving the educational community as they help the nation and the Commission to bridge the Digital Divide.

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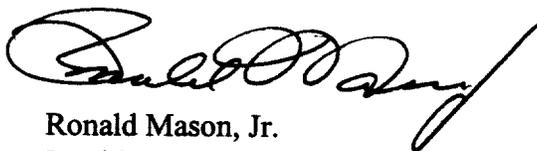
[Handwritten mark]

Commissioner Harold W. Furchtgott-Roth
Page 2
February 15, 2001

If the Commission reallocates any part of the ITS spectrum for 3G mobile device services, the capacity, usefulness, and value of ITS would be significantly diminished. Even if only part of the spectrum is taken away, many educational institutions would lose their ITS service altogether, while others would face new equipment costs, service disruption and cutbacks, lower quality of service and signal interference. In either scenario, the ITS community would be incapable of supporting advanced wireless services and promoting the development of broadband services to the educational community and to underserved communities nationwide.

If the ITS spectrum is compromised in any way, these public benefits will be lost. We hope that you will support us in maintaining the integrity of the spectrum and in keeping this tremendous educational resource alive and strong.

Sincerely,

A handwritten signature in black ink, appearing to read "Ronald Mason, Jr.", written in a cursive style.

Ronald Mason, Jr.
President



00-258
James

ORIGINAL

STATE OF MISSISSIPPI
DAVID RONALD MUSGROVE, GOVERNOR

FEB 21 A 10

DEPARTMENT OF FINANCE AND ADMINISTRATION

GARY ANDERSON
EXECUTIVE DIRECTOR

HAROLD FURCHGOTT

February 15, 2001

Commissioner Harold W. Furchgott-Roth
Federal Communications Commission
445 12th Street, SW
Washington, DC 20554

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MAR - 9 2001

FEDERAL COMMUNICATIONS COMMISSION
OFFICE OF THE SECRETARY

RE: FCC 00-455, ET Docket No. 00-258, RM-9920 and 9911

Dear Commissioner Furchgott-Roth:

I am concerned about the future of the Instructional Television Fixed Service (ITFS) spectrum, which is under assault in the Commission's Notice of Proposed Rule Making on 3G spectrum allocations that was released January 5, 2001. The **Mississippi EDNET Institute** and its ITFS spectrum play an important part of the Mississippi Department of Finance and Administration's effort to serve the citizens of Mississippi. Moreover, preservation of the full ITFS band is absolutely critical if wireless broadband is to become a reality not only in urban areas, but also in many rural areas throughout the State of Mississippi.

As you are aware, recent rule changes have opened the ITFS spectrum to the implementation of wireless two-way video and broadband data services, including high speed Internet access. The educational power of ITFS has been expanded under the digital two-way rules to provide advanced learning services, interactive video, and wireless broadband Internet. As distance learning becomes more robust and interactive, ITFS offers educational institutions throughout the country an affordable high-speed on-ramp to the broadband Internet for students and adult learners in the classroom, at home and at work. This goal was recently cited as the first priority for policymakers by the bipartisan Congressional Web-Based Education Commission. In addition, fixed wireless broadband promises to bring a competitor to DSL and cable modem technologies to our community, making broadband access not only more widely available, but also more affordable.

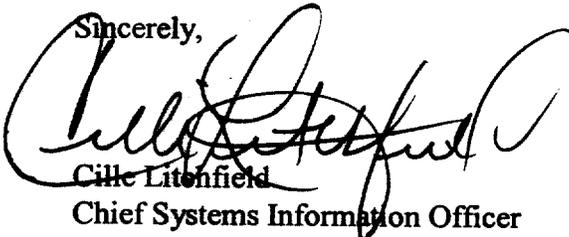
ITFS does not only benefit schools, students, and adult learners, however. In addition to the broad range of community programming currently carried on ITFS spectrum, the recent two-way order has filled a void where legislation and regulation have failed to produce affordable, ubiquitous broadband Internet access for Americans. Working in conjunction with wireless

communications companies, ITFS spectrum is being used to bring broadband to underserved populations in rural, urban, and otherwise isolated communities nationwide. Mississippi's ITFS licenses have more complete coverage than any state in the country, while Mississippi has the greatest distance to travel to bridge the Digital Divide. As stated by Mississippi Governor Ronnie Musgrove in a recent report, "Creating Economic Prosperity for a New Century," our state intends to fully utilize these ITFS licenses to provide available, affordable Internet access in rural areas to both small businesses and to homes. ITFS licenses are, therefore, serving the educational community as they help the nation and the Commission to bridge the Digital Divide.

If the Commission reallocates any part of the ITFS spectrum for 3G mobile device services, the capacity, usefulness, and value of ITFS would be significantly diminished. Even if only part of the spectrum is taken away, many educational institutions would lose their ITFS service altogether, while others would face new equipment costs, service disruption and cutbacks, lower quality of service, and signal interference. In either scenario, the ITFS community would be incapable of supporting advanced wireless services and promoting the development of broadband services to the educational community and to underserved communities nationwide.

If the ITFS spectrum is compromised in any way, these public benefits will be lost. We hope that you will support us in maintaining the integrity of the spectrum and in keeping this tremendous educational resource alive and strong.

Sincerely,



Cille Litenfield
Chief Systems Information Officer

WESTERN OREGON
UNIVERSITY

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MAR - 9 2001

FEDERAL COMMUNICATIONS COMMISSION
OFFICE OF THE SECRETARY

The Honorable Harold W. Furchtgott-Roth
Commissioner
Federal Communications Commission
445 12th St., SW
Washington, DC 20554

EX PARTE OR LATE FILED

Re: FCC 00-455, ET Docket No. 00-258, RM-9920 and 9911

February 16, 2001

Dear Commissioner Furchtgott-Roth:

I write to you on behalf of *Western Oregon University* to express our concern about a recent Federal Communications Commission (FCC) Proposed Rule Making that will have an immediate and disastrous impact on our ability to meet a growing demand among Oregon students for accessible, flexible educational opportunities. The FCC has issued a Notice of Proposed Rule Making (ET Docket No. 00-258, RM-9920 and 9911) seeking comment on a plan to relinquish Instructional Television Fixed Service (ITFS) channels to cellular phone companies for third generation (3G) mobile telephone services, stripping *Western Oregon University* and thousands of other schools across the nation of a powerful and irreplaceable medium. ITFS is an important part of *Western Oregon University's* goal to share educational resources among schools and to provide distance learning opportunities and workforce training directly to students at home, at work, and at neighborhood learning centers. Moreover, ITFS is absolutely critical if wireless broadband is to become a reality not only for our students but also for our entire community.

School districts, colleges, universities, and other educational organizations across the country hold thousands of ITFS licenses, many of which were issued decades ago. Recent FCC rule changes have expanded the educational power of ITFS from one-way video to interactive video, wireless broadband Internet access and advanced learning services to students and adult learners in classrooms, homes and workplaces. ITFS now offers educational institutions throughout the country an affordable high-speed on-ramp to the Internet, a mission that was recently cited as the first priority for policymakers by the bipartisan Congressional Web-Based Education Commission. In addition, fixed wireless broadband promises to bring a competitor to DSL and cable modem technologies to our community, making broadband access not only more widely available but also more affordable.

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Instructional Media Services

Western Oregon University is at the forefront of advancing the new learning services made possible by recent FCC rule changes and we have invested a great deal of time and resources to develop the ITFS spectrum for educational outreach in Oregon. *Western Oregon University* is an active member of the Oregon Wireless Instructional Network (Oregon WIN), a consortium of nine universities and community colleges that operates a multi-channel ITFS network in Oregon's Willamette Valley capable of serving over 65% of Oregon's population. The consortium operates under an Intergovernmental Agreement, is governed by a seven-member board, and works closely with educational ITFS licensees in Bend and Medford, Oregon (see attached list of Oregon ITFS licensees).

Oregon WIN was formed in 1993 for the purpose of jointly developing the ITFS spectrum in Oregon as a much needed "last mile" network solution. The consortium recently completed a \$1.8 million network after spending years filing for ITFS licenses, building the consortium, issuing a national RFP for a commercial partner to develop the spectrum and designing an interconnected, shared network. Oregon WIN operates three ITFS transmission sites in Eugene, Salem and Portland. The sites are linked with multiple, two-way microwave paths, allowing educational providers to serve all three ITFS networks from a single location. Inexpensive ITFS receive antennas are easily installed directly to schools, government offices, businesses and homes. The flexible system allows the delivery of a diverse range of programs including live interactive courses, telecourses, information boards, and cultural events. Oregon WIN members, participating members, and associated institutions offer over 2500 distance learning courses in 65 degree programs (<http://oregonone.org>) to over 29,000 students per year. The Oregon WIN ITFS network is of growing importance in meeting Oregon's distance education needs. With the imminent rollout of two-way broadband data services over the ITFS spectrum, Oregon WIN will provide the full range of video, data and Internet services critical to quality distance education programs and services provided by Oregon's universities and community colleges.

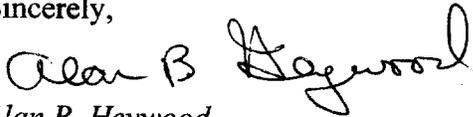
In addition to meeting important, "last mile" networking needs, ITFS is attractive because system development occurs by partnering with the private sector. Through an excess capacity lease agreement with Sprint Corporation, Oregon WIN members are able to focus their resources on educational programming and services and not on telecommunication infrastructure development and operations. FCC rulings over the past ten years have greatly improved the ability for educators and commercial operators to form successful partnerships in the development of the ITFS spectrum. Working in conjunction with wireless communications companies, ITFS is helping to bring broadband to underserved populations in rural, urban and otherwise isolated communities nationwide. ITFS licensees are therefore serving the educational community as they help the nation bridge the Digital Divide.

If the FCC reallocates any part of the ITFS spectrum for 3G mobile device services, the Oregon WIN partnership and network will collapse. Oregon WIN members would either lose their ITFS service altogether or face new equipment costs, service disruption and signal interference. In addition, Oregon WIN would lose our partnership with the private sector and face the prohibitive costs of re-building and operating the network. The spectrum would no longer be available for advanced wireless broadband services to the educational community and to underserved communities nationwide.

As a result of the critical need in Oregon for "last mile," broadband services and our extensive planning and financial investment in developing the ITFS spectrum for educational

outreach, *Western Oregon University* strongly oppose any reallocation of the ITFS spectrum to 3G mobile device services. Reallocation under FCC Notice of Proposed Rule Making (ET Docket No. 00-258, RM-9920 and 9911) is counter to recent FCC rulings which allow educators to fully and effectively develop the spectrum for educational use, and is counter to many local, state and national reports calling for increased access to broadband services to provide educational opportunities to students anywhere, at anytime. If the ITFS spectrum is compromised, these public benefits will be lost. We at *Western Oregon University* hope that you will support us in maintaining the integrity of our spectrum and in keeping this tremendous educational resource alive and well. Thank you for your support.

Sincerely,

A handwritten signature in cursive script that reads "Alan B. Heywood". The signature is written in black ink and is positioned above the printed name.

Alan B. Heywood

Director, Instructional Media Services

Oregon ITFS Licensees

Institution and Contact

Call Signs

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Salem – A Group – WHR - 771

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Eugene - D Group - WNC 487

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Eugene - G Group - WNC 540

Linn/Benton/Lincoln ESD
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Portland – A Group – WHR 543

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Salem - C Group - WNC 718
Eugene - A Group - WNC 527

Oregon University System
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Salem - B Group - WNC -471
Eugene - C Group - WNC 574
Medford - D Group - WNC 771

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Salem - G Group - WNC 717

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Bend - Group

Crook/Deschutes Education Service District
Lee Chapman, Superintendent
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(541) 923-8900

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Bend/LaPine School District
Don Fischer
Bend/LaPine School District
Technology Support Center
(541) 383-6031

Bend - Group

VENTURA COUNTY SUPERINTENDENT OF SCHOOLS OFFICE

Administrative Services Center 5189 Verdugo Way, Camarillo, CA 93012



ADMINISTRATION

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County Superintendent of Schools
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FAX (805) 383-1908

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Associate Superintendent
Educational Services
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FAX: (805) 383-1908

Stanley C. Mantooth
Associate Superintendent
Business & Personnel Services
(805) 383-1905
FAX: (805) 383-1908

Jim Compton
Assistant Superintendent
Student Programs & Services
(805) 388-4423
FAX: (805) 388-4428

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James

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February 16, 2001

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OFFICE OF COMMUNICATIONS
HAROLD FURCHTGOFF

FEDERAL COMMUNICATIONS COMMISSION
OFFICE OF THE SECRETARY

Commissioner Furchgott-Roth
Federal Communications Commission
445 12th Street, SW
Washington, DC 20554

EX PARTE OR LATE FILED

Subject: **FCC 00-455, ET Docket No. 00-258, RM-9920 and 9911**

Dear Commissioner Furchgott-Roth:

I am extremely concerned about the future of the ITFS spectrum which is under assault in the Commission's Notice of Proposed Rule Making on 3G spectrum allocations that was released January 5, 2001. Instructional Television Fixed Service (ITFS) is an integral component of our alternative learning program plan for all Ventura County Schools. Moreover, preservation of the full ITFS band is absolutely critical if wireless broadband is to become a reality for our 137,000 students.

As you know, recent rule changes have opened the ITFS spectrum to the implementation of wireless two-way video and broadband data services, including high-speed Internet access. The educational power of ITFS has been expanded under the digital two-way rules to provide advanced learning services, interactive video, and wireless broadband Internet. As distance learning becomes more robust and interactive, ITFS offers educational institutions throughout the country an affordable high-speed on-ramp to the broadband Internet for students and adult learners in the classroom, at home and at work. This goal was recently cited as the first priority for policymakers by the bipartisan Congressional Web-Based Education Commission. In addition, fixed wireless broadband promises to bring a competitor to DSL and cable modem technologies in our county, making broadband access not only more widely available but also more affordable.

ITFS does not only benefit schools, students and adult learners, however. In addition to the broad range of community programming currently carried on the ITFS spectrum, the recent two-way order has filled a void where legislation and regulation have failed to produce affordable broadband Internet access. Working in conjunction with wireless communication companies, the ITFS spectrum is being used to bring broadband to under-served populations in rural, urban and otherwise isolated communities nationwide. ITFS licensees are

9

Commissioner Furchgott-Roth

Page 2

February 16, 2001

therefore critical to the educational community as they help our county, state, nation and the Commission to bridge the Digital Divide.

If the Commission reallocates any part of the ITFS spectrum for 3G mobile device services, the capacity, usefulness, and value of ITFS would be significantly diminished. Even if only part of the spectrum is taken away, many educational institutions would lose their ITFS service altogether, while others would face new equipment costs, service disruption and cutbacks, lower quality of service and signal interference. In either scenario, the ITFS community would be incapable of supporting advanced wireless services and promoting the development of broadband services to our educational community.

If the ITFS spectrum is compromised in any way, these public benefits will be lost. The Ventura County Superintendent of Schools Office needs your support in maintaining the integrity of our spectrum and in keeping this tremendous educational resource alive and strong.

Sincerely,

A handwritten signature in cursive script, appearing to read "Charles Weis".

Charles Weis, Ph.D.

Ventura County Superintendent of Schools

SW